

INFORMATION TECHNOLOGIES

June 9, 2000

Ms. Magalie Roman Salas
Secretary
Federal Communications Commission
445 Twelfth Street
Washington, DC 20554

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Re: CC Docket No. 98-67 Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities.

Dear Ms. Salas,

Enclosed please find an original copy of the Petition for Reconsideration in the above referenced Docket, filed electronically with the FCC today by VISTA Information Technologies, Inc.

Thank you for your assistance in processing this document.

Sincerely



Rita Beier
Director, Outreach and Quality Assurance
Call Center Services

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List ABCDE

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Before the Federal Communications Commission
Washington, D.C. 20554

In the Matter of:

Telecommunications Relay Services
and Speech-to-Speech Services
for Individuals with Hearing and
Speech Disabilities

CC Docket No. 98-67

VISTA INFORMATION TECHNOLOGIES, INC.
PETITION FOR RECONSIDERATION
OF FCC REPORT AND ORDER NO. FCC 00-56

VISTA Information Technologies, Inc.
489 Whitney Avenue
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Holyoke, MA 01040

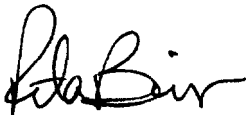


Thomas O'Neill
Vice President
Call Center Services

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Rita Beier
Director, Outreach and Quality Assurance
Call Center Services

**Before the Federal Communications Commission
Washington, D.C. 20554**

In the Matter of:

**Telecommunications Relay Services
and Speech-to-Speech Services
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SUMMARY

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On March 6, 2000 The Federal Communications Commission (FCC) issued its Report and Order (Docket No. 98-67, FCC 00-56) governing provision of Telecommunications Relay Service. Among the changes the Order makes are revisions to the mandatory minimum standards for Communications Assistants. The Order raises the minimum typing speed for Communications Assistants to 60 words per minute (WPM).

VISTA Information Technologies, Inc. (VISTA) as provider of the Massachusetts Telecommunications Relay (MassRelay) respectfully requests that the Federal Communications Commission reconsider the effective date for the minimum typing speed standard for Communications Assistants (CAs) of 60 words per minute at hire date. While VISTA fully supports the Commission's improvement of standards for TRS, the 60-wpm-at-hire typing requirement would severely hamper the ability for Providers to hire candidates and would eliminate some excellent potential CAs without the opportunity to develop their skills.

VISTA has been the Provider of the Massachusetts Telecommunications Relay Service (MassRelay) since May 1, 1999. The typing standard for Relay Operators (they are not referred to as CAs in Massachusetts) in Massachusetts has exceeded the minimum set by the FCC up to this date and, in fact, exceeds the new standard. MassRelay Operators are required to type 65-wpm with 90% accuracy on an individually tested basis, not a group average.

VISTA provides a 90-day training period for Operators to develop their typing skills in order to attain the 65-wpm goal. The Massachusetts Relay contract requires that new hires test at 55 wpm on both audio and visual typing tests. Following their 90-day training period, those Operators must pass audio and visual tests at 65-wpm. VISTA's experience indicates that the lower hiring requirement, combined with the 90-day training period are necessary in order to identify, hire and train sufficiently qualified persons to provide Relay service. VISTA requests that the Commission please review the MassRelay typing speed program as described in this document.

While the MassRelay program has proven to be reasonable and effective, it also has allowed recruitment efforts to remain fruitful, although challenging, in today's tight employment market. We believe that any standard above 55-wpm would severely limit the potential hiring pool beyond what the market could support. Additionally, requiring immediate 60-wpm performance eliminates the Relay Providers opportunity to develop Operators with excellent potential that only require some additional typing instruction.

VISTA therefore, requests that the FCC reconsider the 60-wpm-at-hire requirement and instead allow for a 90-day training period of a lower typing speed. Then, upon being tested at 90 days, the CA/OPR would be required to demonstrate the 60-wpm minimum speed.

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I. CURRENT PRACTICES AND STANDARDS AT MASSRELAY

The current Massachusetts Relay contract is based on an RFP that was carefully crafted to exceed national standards for Relay provision. Relay Operators for MassRelay are required to type 65 wpm with 90 % accuracy. New hires must pass an audio and a visual test at 55 wpm. Then upon completion of their 90-day training period, each Operator must pass audio and visual tests at 65-wpm minimum.

The current working and education environment seldom teaches audio or transcription typing to the average student. Unless someone goes into a specific field, medical transcription or CART reporting for example, they do not acquire the ability to type what they hear with significant speed or accuracy. In addition, the current economic climate is characterized by extremely low unemployment among persons with the skills required to work at MassRelay. VISTA has implemented strategies in order to overcome these difficulties and identify and develop potential candidates as Relay Operators.

For persons unable to demonstrate an ability to reach the incoming 55-wpm standard, VISTA has developed a cooperative training program with a Job Assistance local agency. Good potential candidates (who can type at the 43 – 45 wpm level) are offered free transcription typing instruction, *prior to being hired by VISTA*, at this agency. The applicant can then choose to participate in these classes and return to the Relay Center to be re-tested once their typing speed reaches the 55-wpm hiring minimum.

For those applicants who successfully demonstrate 55 wpm skills, VISTA provides intensive, focused typing training and practice during the initial four-week Operator training session in order to enable trainees to reach 65 wpm ultimate goal. Daily instructional and practice sessions are provided to improve both overall typing skills as well as specific transcription-type skills. Once the trainee “graduates” from their initial training class, they begin handling live relay calls. They are provided, as part of their regularly scheduled shift, additional typing training and practice time depending on their individual skill levels and needs. VISTA has discovered that merely handling Relay calls for the additional 60 days of training combined with applying those techniques acquired in the initial training frequently enables the employee to successfully pass their 90-day tests. However, this additional two-month period, beyond the initial 4-week class, is necessary to develop the speed and accuracy needed to reach the goal.

II. VISTA EXPERIENCE IN HIRING/MEETING STANDARDS

Utilizing the above strategies, VISTA has been able to develop trainees successfully but not without difficulty. Only approximately 10% of the people who initially apply for positions as MassRelay Operators pass the incoming testing (which also includes 2nd-year college level Grammar and Spelling tests...again above the national standard).

The tight employment market, and low success rate upon initial contact require the recruiting department to work tirelessly to attract enough candidates to fill our needs. While all providers face a similar problem hiring CA-level skilled persons, raising the entry-level minimum would substantially tighten the candidate pool.

VISTA's current typing training program has enabled us to staff the MassRelay with qualified Operators. Not only do these Operators demonstrate their skills in regularly scheduled audio typing tests, but typing speeds are tested each month on live calls.

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through our Contract Administrator, Bell Atlantic. In the 12 months that VISTA has held the MassRelay contract, our Operators have never failed to meet the typing speed minimum for any month. This minimum is established each month based on the current ratio of trainee and experienced Operators and their respective typing speed requirements. We believe that by allowing VISTA to hire persons with a lower typing speed and then allowing a 90-day training period to teach and improve typing, Massachusetts has established as successful method to achieve superior Relay typing speeds. However, that 90-day training period is essential to that success.

III. RAISING MINIMUM IMPEDES HIRING AND INCREASES COSTS

While raising the minimum typing speed from 55-wpm to 60-wpm at hire may not at first seem like much of an adjustment, in reality those 5-wpm will be crippling to our hiring efforts. Those infrequent applicants whom enjoy superior audio typing skills (above 50 or 55-wpm) are generally able to gain employment in more highly skilled environments with varied job responsibilities, etc. Relay, by its nature, requires employees who are able to develop strong skills, possess firm ethics, but also are able to perform a singular, repetitive task for hours each day. This type of employee is not the common "first job" type of employee, due to the very strict standards of confidentiality and ethics required by Relay centers. There is a fine balance of personality traits and job skills that are necessary to produce a great Relay Operator who will remain on the job long-term.

Raising the minimum typing speed to 60-wpm at hire would suggest reducing the potential hiring pool more than it is already burdened. VISTA doesn't believe that there is a large enough pool of those highly skilled (and therefore highly marketable) candidates to adequately staff Relay Centers. While it is true that various incentive programs can induce Operators to remain on the job long-term, call centers experience relatively high turnover and Relay is no exception. While our turnover rates are nowhere near as high as a telemarketing center for example, the sedentary, repetitive nature of Relay just isn't for everyone over time. Basically, Relay centers need the broadest possible hiring pool as possible in order to identify and hire strong Relay Operators.

VISTA believes we would face serious challenges both practically and economically should the 60-wpm-at-hire ruling stand. In order to keep the pool as broad as it is today, VISTA would be forced to develop some sort of "pre-Operator" intensive on-site typing training program in addition to our current 4 week Operator training. This additional month of training would be necessary to enable us to continue to hire at 55-wpm and still meet the FCC requirement of 60wpm before the trainee ever handles a call. As stated earlier, handling relay calls is one of the best ways for an Operator to increase typing speed, as it is a "true" call experience with bursts of typing, and moments of rest. Disallowing a 90-day training period with time on live calls means that the Provider must replace all of that on-call typing practice with classroom practice. The cost ramifications are serious. Supporting a job candidate for two months before they can perform any Operator functions is an onerous burden for a Relay Provider to bear (as well as the State).

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IV. PROPOSAL FOR FCC CONSIDERATION

VISTA, based on our experience in hiring and developing highly skilled typists, respectfully requests that the FCC reconsider the 60-wpm in-coming typing minimum. We propose that the minimum hiring standard be set between 50 and 55-wpm and that Providers be allowed a 90-day training period before the OPR/CA is required to demonstrate 60-wpm typing skills. Our plan fully supports the Relay User Community's right to excellent standards of service. We believe that this 90-day training period is not an unreasonable training time period. It will allow the Provider to develop the trainee's typing skills while not putting undue burden on Relay users while the training is taking place. Relay users recognize the value of "live call" training experience, and in fact, many of the Relay RFP's we've reviewed require some "live call" training.

V. CONCLUSION

In conclusion, VISTA commends the Commission for this Order and for improving the minimum standards for Relay provision. We do, however, request reconsideration of the 60-wpm at hire typing requirement for CAs. We believe that our experience in providing the highest typing standard in the country, as described above, demonstrates that CAs can be successfully and efficiently trained if allowed a 90-day training and "speed ramp-up" period, including time handling "live" calls. We therefore request the Commission change the Order to require a 50 or 55-wpm typing skill at hire, with a 60 wpm minimum required when the CA reaches 90 days of employment.

Thank you for your consideration.

Sincerely,

Rita M. Beier
Director, Outreach and Quality Assurance

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